

AMENDMENTS TO THE DRAWINGS

Please amend the drawings as shown on the enclosed replacement sheet. FIG. 1 is amended to change "Printer 17" to "Printer 15."

REMARKS

This paper is in response to the final action dated May 23, 2006. Claims 1, 2, 5-15, and 17-28 are pending in the application; claims 3 and 16 are canceled. Claims 1, 2, 4-11, 15, 17, 18, and 20-27 are rejected under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 6,354,212 to Krinsky (hereinafter "Krinsky") in view of U.S. Patent No. 6,343,264 to Fenton (hereinafter "Fenton"). Claims 12-15 are rejected as obvious over Krinsky and Fenton and further in view of U.S. Patent No. 6,122,391 to Ringland (hereinafter "Ringland"). Claims 19 and 28 are rejected as obvious over Krinsky and Fenton and further in view of U.S. Patent No. 6,005,969 to Thomas (hereinafter "Thomas"). Additionally, the drawings and specification are objected to. Reconsideration is respectfully requested in view of the following arguments.

Objection to the Drawings

The applicants respectfully traverse the objection to the drawings. By this amendment, FIG. 1 is amended as shown on the replacement sheet enclosed herewith. Specifically, "Printer 17" is amended to read "Printer 15" in accordance with the specification and the suggestion of the official action (see the official action, page 4).

With respect to the rejection of the drawings based on 37 CFR 1.83(a), i.e., that the drawings fail to disclose every claimed element, the applicants respectfully disagree. Claims 1-15 are method claims. Method claims 1-15 do not positively claim a "decorative element" or a "window covering," but rather a method of applying a decorative element. In particular, the allegedly objectionable language (e.g., a first portion) is recited in a method step of "dividing the selected decorative element." The method step of "dividing" is clearly shown in FIG. 5 (reference number 92). Furthermore, "where detailed illustration is not essential for a proper understanding of the invention, [the features] should be illustrated in the drawing in the form of a graphical drawing symbol or a labeled representation (e.g., a labeled rectangular box)." See 37 CFR 1.83. The step of "dividing" is clearly presented in FIG. 5, reference number 92.

Additionally, claims 17-28 recite a system that performs the method of claims 1-15. Like claims 1-15, claims 17-28 do not positively claim "a decorative element" or a "window covering." Claims 17-28 positively recite a computer, a printer, window covering data, means for user selection of a sample, and a program for distributing the decorative element.

Furthermore, the applicants respectfully submit that one of ordinary skill in the art would properly understand the invention from the drawings as filed. Thus, the drawings comply with 37 CFR 1.83. Accordingly, the applicants respectfully request withdrawal of the objection to the drawings.

Objection to the Specification

The applicants respectfully traverse the objection to the specification. The applicants submit that the claim terms are clearly supported in the specification. For example, the terms “a first portion” and “a second portion,” are supported in paragraph [0034], specifically stating that a customer may distribute “one or more decorative elements.” Likewise, “a first window covering section” and “a second window covering section,” are also supported in paragraph [0034] specifically stating “two or more portions of window covering 12.” Additionally, “the selection appears continuous across the first window covering section and the second window covering section when the window covering section is in either an open position or a closed position” is also fully supported by paragraph [0034], specifically stating “[the] computer 16 ‘cuts’ or divides (step 92) decorative element 14 and assigns each portion to specific vanes so that a continuous decorative element 14 is apparent when window covering 12 is closed or open.” Thus the claim terms are fully supported by the specification in accordance with 37 CFR 1.75(d)(1). Accordingly, the applicants respectfully request withdrawal of the objection to the specification.

I. § 103(a) Rejections

To establish a *prima facie* case of obviousness, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. Because Krinsky, Fenton, Ringland, and Thomas fail to disclose or suggest each an every element recited by independent claims 1, 8, 18, and 23, the rejection under § 103(a) is improper.

No combination of cited references discloses dividing and physically applying a decorative element to a window covering, as currently claimed in independent claims 1, 8, 18, and 23.

While the applicants agree that Krinsky teaches producing a customizable digital image that is converted into a visual image and printed on a suitable substrate for wallpaper (see the official action, page 3), the applicants strongly disagree with the allegation that

Krinsky teaches “a method of applying a decorative element to a window covering.” See the official action, page 7. In fact, the word “window” does not appear even once in the entire Krinsky patent and the word “covering” only appears once as “wall covering.” Thus, Krinsky cannot disclose a method relating to a window covering, let alone physically applying a decorative element to a window covering, nor can Krinsky provide motivation to suggest applying the method to a window covering.

Likewise, while Fenton discloses a color selection process for assisting customers, the color selection process does not include physically applying a decorative element to a window covering. Specifically, the process of Fenton includes two parts, 1) creating a digital database of color codes to classify a store’s inventory, and 2) a visualization experience. See Fenton, col. 2, lines 26-31. Creating a digital database has nothing to do with applying a decorative element to a window covering. Likewise, the “visualization process” has nothing to do with applying a decorative element to a window covering. Specifically, the “visualization process” facilitates a customer’s color selection process by including three panels 24, 26, 28 that are preprinted with different “color families.” See Fenton, col. 7, lines 33-47. These panels are used in an initial color qualifying phase. See Fenton, col. 7, lines 45-46. Once the qualifying phase is complete (i.e., the customer has chosen a “color family”), the customer can view different colors of the color family on a computer monitor. See Fenton, col. 8, lines 1-11. This customer viewing of colors on a computer screen further allows the customer to identify a preferred carpet color out of the “thousands of carpets in the corporate inventory.” See Fenton, col. 8, lines 12-13. Thus, Fenton simply describes a system that facilitates a customer’s color choice of an already existing product. The Fenton system does not disclose or suggest physically applying the chosen color to a product of any sort, let alone physically applying one or more decorative elements across two or more window covering portions.

Ringland, like Fenton, discloses a method of choosing a particular pre-manufactured product from an inventory. In addition to color, Ringland also facilitates selection of patterns. However, Ringland does not disclose or suggest physically applying the chosen color to a product of any sort, let alone physically applying one or more decorative elements across two or more window covering portions. In particular, Ringland discloses a color selection process that uses spectrophotometric matching in order to select and coordinate multiple related products. See Ringland col. 4, lines 49-52. Thus, Ringland, like Fenton,

helps a customer to select a color for an already existing product (i.e., a manufacturer produces a product in multiple colors, the retailer stocks an inventory of these products and the customer simply selects a desired product with the aid of the Ringland system).

Ringland, like Fenton, displays the different colors on a computer monitor. See Ringland, col. 6, lines 6-11. As a result, Ringland cannot disclose or suggest physically applying the chosen color to a product of any sort, let alone physically applying one or more decorative elements across two or more window covering portions.

Similarly, Thomas discloses a method for visualizing, with the aid of a computer, a wide variety of fabric or textile designs. See Thomas, col. 3, lines 15-17. However, Thomas does not disclose or suggest physically applying a chosen color to a product of any sort, let alone physically applying one or more decorative elements across two or more window covering portions. Specifically, the Thomas device allows a user to visualize modifications and characteristics of components or portions of fabric or textile by selecting and manipulating digital images of the materials. See Thomas, col. 4, lines 18-22. Thus, Thomas, like Fenton and Ringland, permits a user to virtually modify an item, usually carpet or floor covering, by selecting different colors and/or patterns. Thomas does not teach or suggest actually physically applying the color or pattern. As a result, Thomas cannot disclose or suggest physically applying the chosen color to a product of any sort, let alone physically applying one or more decorative elements across two or more window covering portions.


Because none of Krinsky, Fenton, Ringland and Thomas disclose or suggest physically applying one or more decorative elements across two or more window covering portions, as is recited in each of claims 1, 2, 4-15, and 17-28, none of claims 1, 2, 4-15, and 17-28 can be rendered obvious by any combination thereof. Accordingly, the applicants respectfully request withdrawal of the rejection of claims 1, 2, 4-15, and 17-28.

II. Conclusion

The applicants submit the application as a whole is in a condition for allowance, and such action is requested at the examiner's earliest opportunity. The examiner is encouraged to contact the applicants' undersigned attorney with any questions regarding this response or the application as a whole at the telephone numbers indicated below.

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Respectfully submitted,

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